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*Attorneys for Plaintiff/Counterdefendants*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

18 LAS VEGAS SUN, INC., a Nevada  
19 corporation,

Plaintiff,

v.

21 SHELDON ADELSON, an individual, and as  
22 the alter ego of News+Media Capital Group  
23 LLC, Las Vegas Review-Journal, Inc., and  
24 Interface Operations LLC dba Adfam;  
25 PATRICK DUMONT, an individual, and as  
26 alter ego of Las Vegas Review-Journal, Inc.,  
27 News+Media Capital Group, LLC, and Interface  
28 Operations LLC dba Adfam; NEWS+MEDIA  
CAPITAL GROUP LLC, a Delaware limited  
liability company; LAS VEGAS REVIEW-  
JOURNAL, INC., a Delaware corporation;  
INTERFACE OPERATIONS LLC DBA  
ADFAM, a Delaware limited liability company

Case No. 2:19-cv-01667-ART-VCF

**STIPULATION AND ORDER  
REGARDING SEALING PLAINTIFF'S  
MOTION TO COMPEL DEFENDANTS  
TO SUPPLEMENT THEIR PRODUCTION**

1 and as alter ego of Las Vegas Review-Journal,  
2 Inc., and News+Media Capital Group, LLC; and  
DOES, I-X, inclusive,

3 Defendants.

4 LAS VEGAS REVIEW-JOURNAL, INC., a  
5 Delaware corporation,

6 Counterclaimant,

7 v.

8 LAS VEGAS SUN, INC. a Nevada corporation;  
9 BRIAN GREENSPUN, an individual and as the  
alter ego of Las Vegas Sun, Inc.; GREENSPUN  
10 MEDIA GROUP, LLC, a Nevada limited  
liability company, as the alter ego of Las Vegas  
Sun, Inc.,

11 Counterclaim Defendants.

1 Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN  
 2 GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through  
 3 their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm,  
 4 and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants  
 5 NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, PATRICK DUMONT, and  
 6 INTERFACE OPERATIONS LLC DBA ADFAM (collectively the “RJ”), by and through their  
 7 counsel of record, Kemp Jones, LLP, Jenner & Block LLP, and Richard L. Stone, Esq., hereby  
 8 stipulate and agree as follows:

9 1. On March 18, 2022, the Court ordered, *inter alia*, the parties to meet and confer  
 10 prior to filing any additional motions to seal. ECF No. 619.

11 2. On September 29, 2022, Lucy Crow, Esq., on behalf of the Sun, and Mona Kaveh,  
 12 Esq., on behalf of the RJ, met and conferred regarding sealing relating to Plaintiff’s Motion to  
 13 Compel Defendants to Supplement Their Production.

14 3. The parties agree that the following, and any references thereto, is appropriate for  
 15 sealing:

- 16 • **Exhibit 2:** Excerpts of the transcript of the deposition of Stephen Hall and  
 17 Exhibit 6 thereto should be filed under seal because the RJ has designated  
 18 portions of the transcript “Attorneys’ Eyes Only” and “Confidential” pursuant  
 19 to the parties’ Protective Order and Exhibit 6 contains sensitive financial  
 20 information (ECF No. 87). Portions of the deposition transcript that were not  
 21 designated “Attorneys’ Eyes Only” or “Confidential” shall be filed publicly.
- 22 • **Exhibit 4:** The attachment to Michael Gayan’s August 25, 2022, letter to the  
 23 Sun should be filed under seal because the attachment contains sensitive  
 24 financial information and the RJ designated it “Confidential” pursuant to the  
 25 parties’ Protective Order (ECF No. 87).
- 26 • **Exhibit 7:** Excerpts of the transcript of the deposition of Chase Rankin and  
 27 Exhibit 3 thereto should be filed under seal because the deposition transcript is  
 28 temporarily designated as “Confidential” in its entirety pursuant to the parties’

Protective Order, and the parties have until 30 days after receipt of the deposition transcript to confirm what portions, if any, should remain "Confidential" or "Attorney's Eyes Only." ECF No. 87 ¶ 7(a). Given that the 30-day deadline has not run, the entirety of this exhibit is provisionally filed under seal.

DATED this 29th day of September, 2022.

DATED this 29th day of September, 2022.

LEWIS ROCA ROTHGERBER CHRISTIE LLP KEMP JONES LLP

By: /s/ Nicole Scott

By: /s/ Mona Kaveh

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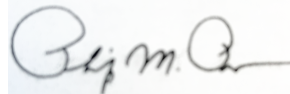
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**IT IS SO ORDERED:**



SPECIAL MASTER

DATED: September 30, 2022